

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Friday, September 12, 2014 9:32 AM
To: Whitson, Amelia
Subject: FW: NPDES Permit Issuance - HI 0021296 Kailua Regional Wastewater Treatment Plant
Attachments: 01037PKP.14a.pdf

See page 6.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-2-3)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Goo, Taryn [<mailto:Taryn.goo@doh.hawaii.gov>]
Sent: Tuesday, January 21, 2014 10:51 AM
To: Sablad, Elizabeth; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: NPDES Permit Issuance - HI 0021296 Kailua Regional Wastewater Treatment Plant

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Friday, May 09, 2014 3:17 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: CCH Kailua and Honouliuli WWTP Stay Stipulations
Attachments: CCHKailuaStay4-23-14.PDF; CCHHonouliStay4-29-13.PDF

Hi Elizabeth. Attached are the CCH Kailua and Honouliuli WWTP permit Stay Stipulations, both of which have been finalized and approved by the Hearing Officer.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Pascua, Noralin F <noralin.pascua@doh.hawaii.gov>
Sent: Thursday, April 17, 2014 11:48 AM
To: Sablad, Elizabeth; jeffrey.larson@usmc.mil; lee.yamamoto@usmc.mil; lkahikina@honolulu.gov; dan.connally@pgenv.com
Cc: Rossio, Marianne Fuji; Weaver, Stefanie
Subject: NPDES Permit Issuance - Permit No. HI 0110078 - Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility
Attachments: 20140416.Final Permit Transmittal - HI 0110078-04028PMR.14.PDF; 20140416.0110078.FNL.14.pdf; 20140416.Final Permit Rationale - HI 0110078-04028PMR.14a.pdf; 20140416.Response to Comments and Final Determination - HI 0110078-04028PMR.14b.pdf

Good Morning,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Stefanie Weaver or Ms. Marianne Rossio at (808) 586-4309.

Thanks,
Nora
DOH-CWB

Sablado, Elizabeth

From: Rossio, Marianne Fuji <marianne.rossio@doh.hawaii.gov>
Sent: Thursday, April 10, 2014 2:31 PM
To: Sablado, Elizabeth
Cc: Lum, Darryl C
Subject: Response to Comments for NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility
Attachments: 04-09-14_Response to Comments MCBH KBay received on February 27 2014.docx; 04-10-14_XXXXXPMR 14b.Revised Permit.doc; 04-10-14_XXXXXPMR 14c.Revised Fact Sheet.doc; 20140228.MCBH Comments on the Public Notice - HI 0110078 (1).PDF; 20140228.CCH Comments on the Public Notice - HI 0110078 (1).PDF

Hi Elizabeth,

In response to the 2nd public notice for the MCBH Kaneohe Bay WRF, we received comments from the MCBH and the City and County of Honolulu. We are forwarding to you our response to comments, revised permit and revised fact sheet for your review. The last two pdf attachments are the comments that were received.

We will wait to hear from you once you have completed your review.

Thank you,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Thursday, April 10, 2014 9:51 AM
To: Sablad, Elizabeth
Subject: RE: Kailua Regional WWTP

Thanks Elizabeth!

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Thursday, April 10, 2014 4:59 AM
To: Poentis, Kris T
Subject: RE: Kailua Regional WWTP

Hi Kris,

Yes. 40 CFR 122.44(d)(1)(iii) states that “when the permitting authority determines...that a discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above the allowable ambient concentration of a State numeric criteria within a State water quality standard for an individual pollutant, the permit must contain *effluent* limits for that pollutant.” (*emphasis added*)

Effluent limits are not receiving water limits. Also see the definition of effluent limitations under 40 CFR 122.2.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Wednesday, April 09, 2014 4:44 PM
To: Sablad, Elizabeth
Subject: Kailua Regional WWTP

Hi Elizabeth,

I’m putting something together for Ted for his hearing tomorrow on the City’s motion to stay certain permit conditions and was wondering if you could tell me offhand if there is anywhere that states we must use end of pipe discharge limitations (as opposed to receiving water limitations). Thanks!

Kris

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, April 10, 2014 7:59 AM
To: 'Poentis, Kris T'
Subject: RE: Kailua Regional WWTP

Hi Kris,

Yes. 40 CFR 122.44(d)(1)(iii) states that “when the permitting authority determines...that a discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above the allowable ambient concentration of a State numeric criteria within a State water quality standard for an individual pollutant, the permit must contain *effluent* limits for that pollutant.” (*emphasis added*)

Effluent limits are not receiving water limits. Also see the definition of effluent limitations under 40 CFR 122.2.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Wednesday, April 09, 2014 4:44 PM
To: Sablad, Elizabeth
Subject: Kailua Regional WWTP

Hi Elizabeth,

I'm putting something together for Ted for his hearing tomorrow on the City's motion to stay certain permit conditions and was wondering if you could tell me offhand if there is anywhere that states we must use end of pipe discharge limitations (as opposed to receiving water limitations). Thanks!

Kris

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Wednesday, April 09, 2014 4:44 PM
To: Sablad, Elizabeth
Subject: Kailua Regional WWTP

Hi Elizabeth,

I'm putting something together for Ted for his hearing tomorrow on the City's motion to stay certain permit conditions and was wondering if you could tell me offhand if there is anywhere that states we must use end of pipe discharge limitations (as opposed to receiving water limitations). Thanks!

Kris

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Friday, April 04, 2014 10:57 AM
To: Sablad, Elizabeth
Subject: Kailua WWTP
Attachments: KailuaSTPContest.PDF; KailuaSTPContest-A.PDF

Hi Elizabeth,

Please see attached for the request for contested case hearing and the motion to stay contested permit conditions.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Goo, Taryn <Taryn.goo@doh.hawaii.gov>
Sent: Friday, February 14, 2014 10:24 AM
To: Sablad, Elizabeth; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: NPDES Permit for Kailua Regional Wastewater Treatment Plant HI 0021296
Attachments: 02024PKP.14.PDF; 0021296PKP.FNL.14.PDF

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at (808)586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Goo, Taryn <Taryn.goo@doh.hawaii.gov>
Sent: Friday, January 24, 2014 10:27 AM
To: Sablad, Elizabeth; jeffrey.larson@usmc.mil; lee.yamamoto@usmc.mil; lkahikina@honolulu.gov; roy.abe@hdrinc.com; jsk@aloha.net
Cc: Rossio, Marianne Fuji
Subject: Notice of Proposed Water Pollution Control Permit for the NPDES Application for Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility HI 0110078
Attachments: 01073PMR.14.PDF; 01073PMR.14a.doc; 01073PMR.14b.pdf; 01073PMR.14c.pdf; 01073PMR.14d.pdf

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Marianne Rossio at (808) 586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Goo, Taryn <Taryn.goo@doh.hawaii.gov>
Sent: Tuesday, January 21, 2014 10:51 AM
To: Sablad, Elizabeth; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: NPDES Permit Issuance - HI 0021296 Kailua Regional Wastewater Treatment Plant
Attachments: 01037PKP.14.PDF; HI0021296.PDF; 01037PKP.14a.pdf; 01037PKP.14b.pdf

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Goo, Taryn <Taryn.goo@doh.hawaii.gov>
Sent: Tuesday, January 21, 2014 10:51 AM
To: Sablad, Elizabeth; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: NPDES Permit Issuance - HI 0021296 Kailua Regional Wastewater Treatment Plant
Attachments: 01037PKP.14.PDF; HI0021296.PDF; 01037PKP.14a.pdf; 01037PKP.14b.pdf

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Tuesday, January 14, 2014 4:18 PM
To: Sablad, Elizabeth
Subject: FW: Response to comments
Attachments: 01037PKP.14b.doc

Sorry Elizabeth! I forgot to ask Taryn to include you in the original message.

From: Goo, Taryn
Sent: Tuesday, January 14, 2014 2:18 PM
To: cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: Response to comments

Good Afternoon,

Please see attached for Response to Comments on Public Notice NPDES Permit and Tentative Determinations for Kailua Regional Wastewater Treatment Plant.

Thank you,
Taryn

Sablad, Elizabeth

From: Goo, Taryn <Taryn.goo@doh.hawaii.gov>
Sent: Tuesday, January 14, 2014 11:08 AM
To: Sablad, Elizabeth; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: NPDES permit issuance - HI 0021296 Kailu Regional Wastewater Treatment Plant
Attachments: 01037PKP.14.PDF; 20140114.0021296.FNL.14.pdf; 01037PKP.14a.pdf

Good Morning,

Please see attached documents for your files.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thank you,
Taryn
DOH-CWB

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Thursday, January 09, 2014 10:32 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW
Subject: RE: Revised agenda for HI NPDES EOY session

Thanks Elizabeth! We will definitely focus on issuing those carry over permits before Sept. 2014. Kailua WWTP is going to be issued tomorrow (1/10/14) or next week Monday or Tuesday.

There is 1 hurdle. We recently completed the data exchange project. CWB's database (WPC system) is now connected to ICIS. Every night a batch process is run and the permit data flows from the WPC system to ICIS. The problem is the limit set coding, which was once done by Enforcement, has to now be done by the Engineering Section. (There are restrictions in our database and permission levels.) There is going to be a big learning curve. Also, this is going to be additional work the Engineering Section has to do. This shouldn't delay the issuance of the carry over permits. But, there is going to be a delay in the information going into ICIS.

Reef and I will attend the Enforcement Section.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]
Sent: Thursday, January 09, 2014 6:39 AM
To: Lum, Darryl C
Cc: Smith, DavidW
Subject: Revised agenda for HI NPDES EOY session

Hi Darryl,
I revised the agenda to include a list of the permits carried over from FY13 (attached). We will be encouraging you to focus on issuing those permits no later than the end of FY14 (September 30, 2014). I think that's entirely possible, but let me know if there are hurdles of which I am not aware.

Also, I wanted to make sure you are aware that the enforcement session on Thursday (I think 8am HST) will be discussing permitting issues, so I hope you can make it to that session as well.

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, January 09, 2014 8:39 AM
To: Lum, Darryl C
Cc: Smith, DavidW
Subject: Revised agenda for HI NPDES EOY session
Attachments: Jan 2014 Agenda for HI NPDES EOY.doc

Follow Up Flag: Follow up
Flag Status: Completed

Hi Darryl,

I revised the agenda to include a list of the permits carried over from FY13 (attached). We will be encouraging you to focus on issuing those permits no later than the end of FY14 (September 30, 2014). I think that's entirely possible, but let me know if there are hurdles of which I am not aware.

Also, I wanted to make sure you are aware that the enforcement session on Thursday (I think 8am HST) will be discussing permitting issues, so I hope you can make it to that session as well.

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablado, Elizabeth

From: Rossio, Marianne Fuji <marianne.rossio@doh.hawaii.gov>
Sent: Tuesday, December 24, 2013 12:59 PM
To: Sablado, Elizabeth
Cc: Lum, Darryl C
Subject: NPDES Permit No. 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility
Attachments: 12-23-13_MR Revisions Response to comments MCBK 12-17-13.docx; 12-23-13_MCBK Permit 10-8-13.doc; 12-23-13_MCBK FS 10-11-13.doc; Comparison of Permits_12-24-13.docx; Comparison of Fact Sheets_12-24-13.docx

Hi Elizabeth,

I am forwarding to you the following documents for the MCBH, Kaneohe Bay WRF:

- 1) Response to Comments from 1st public notice (August 20, 2013)
- 2) Revised Permit
- 3) Revised Fact Sheet
- 4) Comparison document comparing revised permit and originally public noticed permit
- 5) Comparison document comparing revised fact sheet and originally public noticed fact sheet

We will go to public notice after you have completed your review.

Also, just wondering if you had a chance to take a look at the permit and fact sheet for NPDES Permit No. 0021872 Pressure-Washing of Fuel Transfer Pipeline at the Kaunakakai Harbor.

Thank you and happy holidays,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablado, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Friday, December 06, 2013 10:02 AM
To: Sablado, Elizabeth
Subject: RE: Permit Status

Hi Elizabeth,

Please see below.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Lum, Darryl C
Sent: Thursday, December 05, 2013 8:15 AM
To: 'Sablado, Elizabeth'
Subject: RE: Permit Status

Hi Elizabeth,

Sorry, our network is down this morning and Kris is returning tomorrow from vacation. I'll get you the status of 1, 2, 4, and 8 tomorrow.

1. Chevron **PG is helping us respond to comments.**
2. Sand Island **PG is helping us respond to comments.**
3. Pearl Harbor Shipyard **Will issue 12/6/13 or 12/9/13.**
4. Kailua **PG helped us respond to some of the comments. We will start working on the rest of the response.**
5. MCB Kaneohe Bay **Waiting for applicant to provide compliance schedule information. They said due to Thanksgiving holiday they couldn't get their submittal signed. They told us they can get us the information by early next week. We need to public notice this permit again.**
6. Hilo **Will send out public notice package next week.**
7. Waikiki Aquarium **Will issue next week.**
8. Army Garrison MS4 **We are working on revisions based on EPA comments. Our Enforcement met with the Permittee on Tuesday regarding enforcement issues, and we may need to add things in the permit depending on what was negotiated. We need to discuss with our Enforcement Section.**

I wasn't able to work on the assimilative capacity. I'm going to discuss with our QA/QC office and Myron.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Wednesday, December 04, 2013 8:59 AM
To: Lum, Darryl C
Subject: Permit Status

Hi Darryl,
It's been awhile! I just wanted to check in and find out the status of a few permits. Can you let me know the status for the following permits?

1. Chevron
2. Sand Island
3. Pearl Harbor Shipyard
4. Kailua
5. MCB Kaneohe Bay
6. Hilo
7. Waikiki Aquarium
8. Army Garrison MS4

Also, you had mentioned awhile back that you were thinking about revising the assimilative capacity approach. What's the status of that?

Hope you are doing well!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Thursday, December 05, 2013 10:15 AM
To: Sablad, Elizabeth
Subject: RE: Permit Status

Hi Elizabeth,

Sorry, our network is down this morning and Kris is returning tomorrow from vacation. I'll get you the status of 1, 2, 4, and 8 tomorrow.

1. Chevron
2. Sand Island
3. Pearl Harbor Shipyard **Will issue 12/6/13 or 12/9/13.**
4. Kailua
5. MCB Kaneohe Bay **Waiting for applicant to provide compliance schedule information. They said due to Thanksgiving holiday they couldn't get their submittal signed. They told us they can get us the information by early next week. We need to public notice this permit again.**
6. Hilo **Will send out public notice package next week.**
7. Waikiki Aquarium **Will issue next week.**
8. Army Garrison MS4

I wasn't able to work on the assimilative capacity. I'm going to discuss with our QA/QC office and Myron.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]
Sent: Wednesday, December 04, 2013 8:59 AM
To: Lum, Darryl C
Subject: Permit Status

Hi Darryl,
It's been awhile! I just wanted to check in and find out the status of a few permits. Can you let me know the status for the following permits?

1. Chevron
2. Sand Island

3. Pearl Harbor Shipyard
4. Kailua
5. MCB Kaneohe Bay
6. Hilo
7. Waikiki Aquarium
8. Army Garrison MS4

Also, you had mentioned awhile back that you were thinking about revising the assimilative capacity approach. What's the status of that?

Hope you are doing well!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, October 22, 2013 3:00 PM
To: 'Poentis, Kris T'
Subject: RE: comment deadline for Kailua?

Thanks!

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Tuesday, October 22, 2013 2:59 PM
To: Sablad, Elizabeth
Subject: RE: comment deadline for Kailua?

Oct. 25

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Tuesday, October 22, 2013 11:55 AM
To: Poentis, Kris T
Cc: Lum, Darryl C
Subject: comment deadline for Kailua?

Hi Kris,
What is the comment deadline for Kailua WWTP?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Tuesday, October 22, 2013 2:59 PM
To: Sablad, Elizabeth
Subject: RE: comment deadline for Kailua?

Oct. 25

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Tuesday, October 22, 2013 11:55 AM
To: Poentis, Kris T
Cc: Lum, Darryl C
Subject: comment deadline for Kailua?

Hi Kris,
What is the comment deadline for Kailua WWTP?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, October 22, 2013 2:55 PM
To: 'Poentis, Kris T'
Cc: 'Lum, Darryl C'
Subject: comment deadline for Kailua?

Hi Kris,
What is the comment deadline for Kailua WWTP?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, October 22, 2013 1:45 PM
To: 'Poentis, Kris T'; 'Dan Connally'
Cc: 'Lum, Darryl C'
Subject: FW: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296
Attachments: 20130918-Public Notice Transmittal -HI0021296.PDF; 09055PKP.13a.pdf

This I believe is the one that was public noticed.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Hui, Siu Mei [<mailto:siumei.hui@doh.hawaii.gov>]
Sent: Friday, September 20, 2013 5:03 PM
To: Sablad, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296

Dear All,

Please see attached files for Kailua Refional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

1) Transmittal letter

2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

Sablad, Elizabeth

From: Dan Connally <dan.connally@pgenv.com>
Sent: Tuesday, October 22, 2013 10:06 AM
To: Dan Connally; Poentis, Kris T; Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: RE: Informal comments on Kailua WWTP - let's discuss

Sorry guys, time corrected to 10:30 AM (HST).

Date: 10/22/2013 (today)
Time: 10:30 am (HST)
Number: 1-866-394-4146
Code: 91711087#

Talk to you all soon,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Tuesday, October 22, 2013 1:03 PM
To: Dan Connally; Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: RE: Informal comments on Kailua WWTP - let's discuss

Ok – today 10:30 HST is good for both Darryl and I. Hopefully it will be quick so Dan can leave. Thanks!

From: Dan Connally [<mailto:dan.connally@pgenv.com>]
Sent: Tuesday, October 22, 2013 6:38 AM
To: Sablad, Elizabeth; Poentis, Kris T
Cc: Lum, Darryl C
Subject: RE: Informal comments on Kailua WWTP - let's discuss

I'm available all day today and tomorrow as well, although once again I need to leave right at 5PM this evening (promise this is the last day for awhile). If you let me know a good date and time I'll set up the call.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Monday, October 21, 2013 6:23 PM
To: Poentis, Kris T
Cc: Lum, Darryl C; Dan Connally
Subject: Informal comments on Kailua WWTP - let's discuss

Hi Kris,

Below are my informal comments on the public-notice permit for Kailua WWTP. Please do not formally respond to these comments. I would like to set up a call to discuss them with you and Dan prior to the end of the comment period. Could you confirm for me the last day of the comment period? I'm available tomorrow from 10:30am – 12:30 HST or pretty much anytime on Wednesday.

Thanks,
Elizabeth

Informal comments on Kailua WWTP public-notice permit:

1. **Finalizing permits for permittee/public review: please remember to remove any comments/highlights from all documents prior to release to permittee.**
2. Footnote 1 on page 3 incorrectly states the mass-based limits are based on a flow of 38 MGD. This should be 12.7 MGD. Please double-check mass-based limits were calculated correctly.
3. Page 6: remove language regarding obtaining gametes, since this is not a problem anymore.
4. Page 7: remove use of receiving water for dilution water. Only lab dilution water should be used.
5. Page 17: the offshore monitoring should be linked to the ZOM limits, as discussed on Honouliuli.
6. Fact Sheet, page 5: use 2012 303(d) list.
7. Fact Sheet, page 21: typos in first and second paragraph. Should read "ammonia," not "nitrate+nitrite."
8. Fact Sheet, page 23: oil and grease justification must match permit requirements and backsliding must be addressed if removing previous effluent limits.
9. Fact Sheet, page 23-24: cite portion of EPA regulation that specifies criteria for entero are applicable to Hawaii.
10. Fact Sheet, page 24: how were the enterococcus WQBELs calculated? I am not getting the same numbers. Please double-check calculations.
11. Fact Sheet, page 26: cites the draft T. gratilla method. Should cite published method.
12. Fact Sheet, Table F-11: not clear how geomean of ammonia at M6 is so much higher than the annual geomeans used for assimilative capacity assessment based on the information provided in the footnotes. Please explain.
13. Let's discuss whether or not it is appropriate to use the 15.25 MGD to establish mass-based limits for chlordane and dieldrin.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Hui, Siu Mei [<mailto:siumei.hui@doh.hawaii.gov>]
Sent: Friday, September 20, 2013 5:03 PM
To: Sablad, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment Plant - HI 0021296

Dear All,

Please see attached files for Kailua Regional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

1) Transmittal letter

2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

Sablado, Elizabeth

From: Sablado, Elizabeth
Sent: Tuesday, October 22, 2013 10:04 AM
To: 'Poentis, Kris T'; 'Dan Connally'
Cc: 'Lum, Darryl C'
Subject: RE: Informal comments on Kailua WWTP - let's discuss

Works for me ☺

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Tuesday, October 22, 2013 10:03 AM
To: Dan Connally; Sablado, Elizabeth
Cc: Lum, Darryl C
Subject: RE: Informal comments on Kailua WWTP - let's discuss

Ok – today 10:30 HST is good for both Darryl and I. Hopefully it will be quick so Dan can leave. Thanks!

From: Dan Connally [<mailto:dan.connally@pgenv.com>]
Sent: Tuesday, October 22, 2013 6:38 AM
To: Sablado, Elizabeth; Poentis, Kris T
Cc: Lum, Darryl C
Subject: RE: Informal comments on Kailua WWTP - let's discuss

I'm available all day today and tomorrow as well, although once again I need to leave right at 5PM this evening (promise this is the last day for awhile). If you let me know a good date and time I'll set up the call.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Monday, October 21, 2013 6:23 PM
To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: Informal comments on Kailua WWTP - let's discuss

Hi Kris,

Below are my informal comments on the public-notice permit for Kailua WWTP. Please do not formally respond to these comments. I would like to set up a call to discuss them with you and Dan prior to the end of the comment period. Could you confirm for me the last day of the comment period? I'm available tomorrow from 10:30am – 12:30 HST or pretty much anytime on Wednesday.

Thanks,
Elizabeth

Informal comments on Kailua WWTP public-notice permit:

1. **Finalizing permits for permittee/public review: please remember to remove any comments/highlights from all documents prior to release to permittee.**
2. Footnote 1 on page 3 incorrectly states the mass-based limits are based on a flow of 38 MGD. This should be 12.7 MGD. Please double-check mass-based limits were calculated correctly.
3. Page 6: remove language regarding obtaining gametes, since this is not a problem anymore.
4. Page 7: remove use of receiving water for dilution water. Only lab dilution water should be used.
5. Page 17: the offshore monitoring should be linked to the ZOM limits, as discussed on Honouliuli.
6. Fact Sheet, page 5: use 2012 303(d) list.
7. Fact Sheet, page 21: typos in first and second paragraph. Should read "ammonia," not "nitrate+nitrite."
8. Fact Sheet, page 23: oil and grease justification must match permit requirements and backsliding must be addressed if removing previous effluent limits.
9. Fact Sheet, page 23-24: cite portion of EPA regulation that specifies criteria for entero are applicable to Hawaii.
10. Fact Sheet, page 24: how were the enterococcus WQBELs calculated? I am not getting the same numbers. Please double-check calculations.
11. Fact Sheet, page 26: cites the draft T. gratilla method. Should cite published method.
12. Fact Sheet, Table F-11: not clear how geomean of ammonia at M6 is so much higher than the annual geomeans used for assimilative capacity assessment based on the information provided in the footnotes. Please explain.
13. Let's discuss whether or not it is appropriate to use the 15.25 MGD to establish mass-based limits for chlordane and dieldrin.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044

sablad.elizabeth@epa.gov

From: Hui, Siu Mei [<mailto:siumei.hui@doh.hawaii.gov>]

Sent: Friday, September 20, 2013 5:03 PM

To: Sablad, Elizabeth; dan.connally@pgehv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov

Cc: Poentis, Kris T

Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296

Dear All,

Please see attached files for Kailua Refional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

1) Transmittal letter

2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Monday, October 21, 2013 3:23 PM
To: 'Poentis, Kris T'
Cc: 'Lum, Darryl C'; 'dan.connally@pgenv.com'
Subject: Informal comments on Kailua WWTP - let's discuss

Hi Kris,

Below are my informal comments on the public-notice permit for Kailua WWTP. Please do not formally respond to these comments. I would like to set up a call to discuss them with you and Dan prior to the end of the comment period. Could you confirm for me the last day of the comment period? I'm available tomorrow from 10:30am – 12:30 HST or pretty much anytime on Wednesday.

Thanks,
Elizabeth

Informal comments on Kailua WWTP public-notice permit:

1. **Finalizing permits for permittee/public review: please remember to remove any comments/highlights from all documents prior to release to permittee.**
2. Footnote 1 on page 3 incorrectly states the mass-based limits are based on a flow of 38 MGD. This should be 12.7 MGD. Please double-check mass-based limits were calculated correctly.
3. Page 6: remove language regarding obtaining gametes, since this is not a problem anymore.
4. Page 7: remove use of receiving water for dilution water. Only lab dilution water should be used.
5. Page 17: the offshore monitoring should be linked to the ZOM limits, as discussed on Honouliuli.
6. Fact Sheet, page 5: use 2012 303(d) list.
7. Fact Sheet, page 21: typos in first and second paragraph. Should read "ammonia," not "nitrate+nitrite."
8. Fact Sheet, page 23: oil and grease justification must match permit requirements and backsliding must be addressed if removing previous effluent limits.
9. Fact Sheet, page 23-24: cite portion of EPA regulation that specifies criteria for entero are applicable to Hawaii.
10. Fact Sheet, page 24: how were the enterococcus WQBELs calculated? I am not getting the same numbers. Please double-check calculations.
11. Fact Sheet, page 26: cites the draft T. gratilla method. Should cite published method.
12. Fact Sheet, Table F-11: not clear how geomean of ammonia at M6 is so much higher than the annual geomeans used for assimilative capacity assessment based on the information provided in the footnotes. Please explain.
13. Let's discuss whether or not it is appropriate to use the 15.25 MGD to establish mass-based limits for chlordane and dieldrin.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Hui, Siu Mei [<mailto:siumei.hui@doh.hawaii.gov>]
Sent: Friday, September 20, 2013 5:03 PM
To: Sablad, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296

Dear All,

Please see attached files for Kailua Refional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

1) Transmittal letter

2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

Sablad, Elizabeth

From: Dan Connally <dan.connally@pgenv.com>
Sent: Tuesday, September 24, 2013 5:04 AM
To: Sablad, Elizabeth
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Ok, thanks. I'll make sure to incorporate that change into my edits.

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Monday, September 23, 2013 6:27 PM
To: Dan Connally
Subject: FW: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hey Dan,
I just realized you may not be aware of this. DOH is going to re-public notice this permit in order to change the assimilative capacity assessment to be in line with the Kailua permit (see email chain below).

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Wednesday, September 11, 2013 8:51 AM
To: 'Lum, Darryl C'
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Okay, thanks Darryl.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)

San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Tuesday, September 10, 2013 3:53 PM
To: Sablad, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji; kris.poentis@doh.hawaii.gov
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi Elizabeth,

We are going to contact the MCB Kaneohe and inform them about the Kailua permit decision and re-public noticing.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Tuesday, September 10, 2013 12:06 PM
To: Poentis, Kris T; Lum, Darryl C; Wong, Alec Y; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]

Sent: Friday, September 06, 2013 10:40 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov

Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Monday, September 23, 2013 3:27 PM
To: 'Dan Connally'
Subject: FW: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hey Dan,

I just realized you may not be aware of this. DOH is going to re-public notice this permit in order to change the assimilative capacity assessment to be in line with the Kailua permit (see email chain below).

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Wednesday, September 11, 2013 8:51 AM
To: 'Lum, Darryl C'
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Okay, thanks Darryl.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Tuesday, September 10, 2013 3:53 PM
To: Sablad, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji; kris.poentis@doh.hawaii.gov
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi Elizabeth,

We are going to contact the MCB Kaneohe and inform them about the Kailua permit decision and re-public noticing.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablاد.Elizabeth@epa.gov>]
Sent: Tuesday, September 10, 2013 12:06 PM
To: Poentis, Kris T; Lum, Darryl C; Wong, Alec Y; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablاد.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geometric means. Please let us know if you want to talk about this further. Thanks!

Kris

Sablado, Elizabeth

From: Hui, Siu Mei <siumei.hui@doh.hawaii.gov>
Sent: Friday, September 20, 2013 5:03 PM
To: Sablado, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov
Cc: Poentis, Kris T
Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment Plant - HI 0021296
Attachments: 20130918-Public Notice Transmittal -HI0021296.PDF; 09055PKP.13a.pdf

Dear All,

Please see attached files for Kailua Regional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

1) Transmittal letter

2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

Sablado, Elizabeth

From: Pascua, Noralin F <noralin.pascua@doh.hawaii.gov>
Sent: Monday, September 16, 2013 10:52 AM
To: Sablad, Elizabeth; dan.connally@pgenv.com
Cc: Poentis, Kris T
Subject: Public Notice Package - Permit No. HI 0021296 - Kailua Regional Wasterwater Treatment Plant
Attachments: 0021296-09043PKP.13.PDF; 09043PKP.13a.doc; 09043PKP.13b.doc; 09043PKP.13c.doc; 09043PKP.13d.doc

Ms. Sablad and Mr. Connally,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,
Nora
DOH-CWB

Sablado, Elizabeth

From: Sablado, Elizabeth
Sent: Wednesday, September 11, 2013 8:51 AM
To: 'Lum, Darryl C'
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Okay, thanks Darryl.

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Tuesday, September 10, 2013 3:53 PM
To: Sablado, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji; kris.poentis@doh.hawaii.gov
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi Elizabeth,

We are going to contact the MCB Kaneohe and inform them about the Kailua permit decision and re-public noticing.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Tuesday, September 10, 2013 12:06 PM
To: Poentis, Kris T; Lum, Darryl C; Wong, Alec Y; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablado, Elizabeth

From: Sablado, Elizabeth
Sent: Wednesday, September 11, 2013 7:33 AM
To: Smith, DavidW
Subject: FW: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

FYI – looks like they are going to re-public notice MCB Kaneohe Bay WRF to be consistent with the Kailua decision.

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Tuesday, September 10, 2013 3:53 PM
To: Sablado, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji; kris.poentis@doh.hawaii.gov
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi Elizabeth,

We are going to contact the MCB Kaneohe and inform them about the Kailua permit decision and re-public noticing.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Tuesday, September 10, 2013 12:06 PM
To: Poentis, Kris T; Lum, Darryl C; Wong, Alec Y; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Tuesday, September 10, 2013 3:53 PM
To: Sablad, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji; kris.poentis@doh.hawaii.gov
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi Elizabeth,

We are going to contact the MCB Kaneohe and inform them about the Kailua permit decision and re-public noticing.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Tuesday, September 10, 2013 12:06 PM
To: Poentis, Kris T; Lum, Darryl C; Wong, Alec Y; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]

Sent: Friday, September 06, 2013 10:40 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov

Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablado, Elizabeth

From: Smith, DavidW
Sent: Tuesday, September 10, 2013 3:32 PM
To: Sablad, Elizabeth
Subject: RE: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Two facilities use the same outfall? Let's discuss this one a bit more:

- Does the existing Kailua permit give dilution credit?
- If so, is it the same as before?
- If not, we probably have an issue.

You are raising a good point here- why should one get dilution and the other not?

David Smith
Manager
NPDES Permits Office (WTR-5)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94602
(415) 972-3464 (office)
(415) 972-947-3545 (fax)

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 3:09 PM
To: Smith, DavidW
Subject: FW: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

FYI

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 3:06 PM
To: 'Poentis, Kris T'; Lum, Darryl C; alec.wong@doh.hawaii.gov; 'Rossio, Marianne Fuji'
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 3:09 PM
To: Smith, DavidW
Subject: FW: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

FYI

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 3:06 PM
To: 'Poentis, Kris T'; Lum, Darryl C; alec.wong@doh.hawaii.gov; 'Rossio, Marianne Fuji'
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 3:06 PM
To: Poentis, Kris T; Lum, Darryl C; alec.wong@doh.hawaii.gov; Rossio, Marianne Fuji
Subject: MCB Kaneohe Bay WRF and assimilative capacity for Kailua WWTP

Hi All,

I was just reviewing the MCB Kaneohe Bay WRF public-noticed permit and realized that this decision on Kailua may have a large impact on this permit. The same exact data for ammonia was used, since they share an outfall with Kailua, and therefore, the decision for the MCB Kaneohe permit was not to provide dilution and to provide a compliance schedule for ammonia. In order for the MCB Kaneohe permit to be updated consistent with the decision regarding Kailua, the permit would probably need to be re-public noticed. Have you considered this issue?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablاد.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, September 10, 2013 1:54 PM
To: 'Kurano, Matthew'
Subject: FW: Kailua WWTP
Attachments: Kailua WWTP_HI_9-4-2013_Admin Draft Permit.doc

Kailua

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Thursday, September 05, 2013 1:11 PM
To: Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua WWTP

Hi Elizabeth,
Please disregard the previous version of the draft permit I sent and review and comment on the attached. Thanks!
Kris

Sablado, Elizabeth

From: Sablado, Elizabeth
Sent: Tuesday, September 10, 2013 11:08 AM
To: 'Poentis, Kris T'
Cc: 'Lum, Darryl C'
Subject: RE: Kailua Regional WWTP public notice permit, fact sheet & response to comments

Hi Kris,

I recommend moving this forward to public notice. I will review it during the public comment period. Thanks.

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Thursday, September 05, 2013 12:35 PM
To: Sablado, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua Regional WWTP public notice permit, fact sheet & response to comments

Hi Elizabeth,

Please review and comment on the attached draft permit, fact sheet and response to comments for Kailua Regional WWTP. Thanks!

Kris

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Friday, September 06, 2013 10:40 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; alec.wong@doh.hawaii.gov
Subject: Kailua Regional WWTP

Hi Elizabeth,

I forgot to mention to you when I emailed the revised draft permit and fact sheet for Kailua Regional WWTP yesterday that the Branch decided to grant assimilative capacity for ammonia nitrogen. We used the rationale that although there was one year that was above 90% of the WQS, there was a declining trend in geomeans. Please let us know if you want to talk about this further. Thanks!

Kris

Sablado, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Thursday, September 05, 2013 1:11 PM
To: Sablado, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua WWTP
Attachments: Kailua WWTP_HI_9-4-2013_Admin Draft Permit.doc

Hi Elizabeth,

Please disregard the previous version of the draft permit I sent and review and comment on the attached. Thanks!
Kris

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Thursday, September 05, 2013 12:35 PM
To: Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua Regional WWTP public notice permit, fact sheet & response to comments
Attachments: Kailua WWTP_HI_9-4-2013_Admin Draft Permit.doc; Kailua WWTP_HI0020117_9-4-2013_Admin Draft Fact Sheet.docx; Response to Kailua WWTP comments 9-4-13.docx

Hi Elizabeth,

Please review and comment on the attached draft permit, fact sheet and response to comments for Kailua Regional WWTP. Thanks!

Kris

Sablado, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Friday, August 23, 2013 2:35 PM
To: Sablado, Elizabeth
Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Elizabeth,

Thanks. We'll leave the permit as is.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [mailto:Sablado.Elizabeth@epa.gov]
Sent: Friday, August 23, 2013 10:42 AM
To: Lum, Darryl C
Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl,

This type of decision would not be consistent with your new procedure for assessing assimilative capacity and could create a slippery slope of subjective justifications for permit requirements. Instead, I recommend keeping the requirements as is, with the knowledge that they are required to assess assimilative capacity for ammonia as part of the ZOM dilution study, and will be under a schedule of compliance. Once the study results are available, the permit can be reopened to adjust the requirements accordingly.

Sincerely,
Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]
Sent: Friday, August 23, 2013 12:44 PM

To: Sablad, Elizabeth

Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Elizabeth,

Page 19 and 20 of the Kailua WWTP fact sheet mentions that assimilative capacity is not present for Ammonia Nitrogen. (Please see below.) This was due to the 2009 geomean. Between 2010 and 2012 it is trending down (sort of). Would you be ok if this trend was taken into account and we give back the ZOM for Ammonia Nitrogen?

Thanks,
Darryl

Page 19 and 20 of Fact Sheet

Data from all stations (including surface, middle, and bottom) are aggregated together to represent the decision unit and generate annual geomeans. To ensure adequate assimilative capacity, the highest annual geomean for the decision unit shall not exceed 90 percent of the applicable WQS.

The resulting geomeans were:

Year	Result (µg/L)
2008	1.7
2009	2.1
2010	1.2
2011	1.3
2012	1.2

The highest annual geomean for the decision unit of 2.1 µg/L is greater than 90 percent of the applicable WQS (1.8 µg/L). Assimilative capacity is not present in the receiving water.

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablاد.Elizabeth@epa.gov>]

Sent: Friday, August 23, 2013 8:48 AM

To: Lum, Darryl C; Poentis, Kris T

Cc: Dan Connally

Subject: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl and Kris,
Here are my comments on the revised Kailua WWTP draft permit:

1. The compliance schedule justification in the fact sheet needs a stronger link between the assessment of the length of this specific schedule, the interim requirements for this specific schedule, and the CFR requirements.
2. There is reference to an accelerated monitoring trigger for ammonia and nitrate+nitrate in footnote 2 to the effluent limit table on page 4 of the permit. Is this carryover from the previous permit's threshold requirement? It doesn't seem relevant here.
3. In the ZOM limits section of the permit – it may not be necessary to include ammonia, since there are already end-of-pipe limits for ammonia and no assimilative capacity is available.
4. Page 19 of the permit, offshore monitoring – it would be good to link these monitoring requirements with the ZOM limits.
5. There is a comment by Dan that the discharge point is 1500 feet north of the ZOM – how did the facility determine the direction/extent of their discharge plume? Is this based on the dilution model from 1985?
6. Page 27 of the permit – the Pretreatment reporting address for EPA should be addressed to the “Regional Pretreatment Coordinator” with the WTR-5 mailcode.
7. Page 39 of the permit discusses that if a sampling result is below the MDL, it should be reported as “0.” Wouldn't it be better to be reported as “ND” or non-detect? I have seen this language in only one other permit – is it new?
8. Page 41 of the permit includes the same sentence twice regarding the sludge reporting requirement to EPA.
9. Why was there no chlorine data? Was the discharger not required to monitor for chlorine in the previous permit? What about a priority pollutant scan?
10. Page 15 of the fact sheet includes a typo: a paragraph starting with “During periods...” should start without those words.
11. Recommend including enterococcus RPA information in the RPA table.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Friday, August 23, 2013 1:42 PM
To: 'Lum, Darryl C'
Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl,

This type of decision would not be consistent with your new procedure for assessing assimilative capacity and could create a slippery slope of subjective justifications for permit requirements. Instead, I recommend keeping the requirements as is, with the knowledge that they are required to assess assimilative capacity for ammonia as part of the ZOM dilution study, and will be under a schedule of compliance. Once the study results are available, the permit can be reopened to adjust the requirements accordingly.

Sincerely,

Elizabeth

Elizabeth Sablad

NPDES Permits Office

U.S. EPA Region 9

75 Hawthorne St. (WTR-5)

San Francisco, CA 94105

(415) 972-3044

sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Friday, August 23, 2013 12:44 PM
To: Sablad, Elizabeth
Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Elizabeth,

Page 19 and 20 of the Kailua WWTP fact sheet mentions that assimilative capacity is not present for Ammonia Nitrogen. (Please see below.) This was due to the 2009 geomean. Between 2010 and 2012 it is trending down (sort of). Would you be ok if this trend was taken into account and we give back the ZOM for Ammonia Nitrogen?

Thanks,

Darryl

Page 19 and 20 of Fact Sheet

Data from all stations (including surface, middle, and bottom) are aggregated together to represent the decision unit and generate annual geomeans. To ensure adequate assimilative capacity, the highest annual geomean for the decision unit shall not exceed 90 percent of the applicable WQS.

The resulting geomeans were:

Year	Result (µg/L)
2008	1.7
2009	2.1
2010	1.2
2011	1.3
2012	1.2

The highest annual geomean for the decision unit of 2.1 µg/L is greater than 90 percent of the applicable WQS (1.8 µg/L). Assimilative capacity is not present in the receiving water.

Darryl Lum

Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Friday, August 23, 2013 8:48 AM
To: Lum, Darryl C; Poentis, Kris T
Cc: Dan Connally
Subject: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl and Kris,

Here are my comments on the revised Kailua WWTP draft permit:

1. The compliance schedule justification in the fact sheet needs a stronger link between the assessment of the length of this specific schedule, the interim requirements for this specific schedule, and the CFR requirements.
2. There is reference to an accelerated monitoring trigger for ammonia and nitrate+nitrate in footnote 2 to the effluent limit table on page 4 of the permit. Is this carryover from the previous permit's threshold requirement? It doesn't seem relevant here.
3. In the ZOM limits section of the permit – it may not be necessary to include ammonia, since there are already end-of-pipe limits for ammonia and no assimilative capacity is available.
4. Page 19 of the permit, offshore monitoring – it would be good to link these monitoring requirements with the ZOM limits.
5. There is a comment by Dan that the discharge point is 1500 feet north of the ZOM – how did the facility determine the direction/extent of their discharge plume? Is this based on the dilution model from 1985?
6. Page 27 of the permit – the Pretreatment reporting address for EPA should be addressed to the "Regional Pretreatment Coordinator" with the WTR-5 mailcode.
7. Page 39 of the permit discusses that if a sampling result is below the MDL, it should be reported as "0." Wouldn't it be better to be reported as "ND" or non-detect? I have seen this language in only one other permit – is it new?
8. Page 41 of the permit includes the same sentence twice regarding the sludge reporting requirement to EPA.
9. Why was there no chlorine data? Was the discharger not required to monitor for chlorine in the previous permit? What about a priority pollutant scan?
10. Page 15 of the fact sheet includes a typo: a paragraph starting with "During periods..." should start without those words.
11. Recommend including enterococcus RPA information in the RPA table.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,

Darryl

Darryl Lum

Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablado, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Friday, August 23, 2013 12:44 PM
To: Sablado, Elizabeth
Subject: RE: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Elizabeth,

Page 19 and 20 of the Kailua WWTP fact sheet mentions that assimilative capacity is not present for Ammonia Nitrogen. (Please see below.) This was due to the 2009 geomean. Between 2010 and 2012 it is trending down (sort of). Would you be ok if this trend was taken into account and we give back the ZOM for Ammonia Nitrogen?

Thanks,
Darryl

Page 19 and 20 of Fact Sheet

Data from all stations (including surface, middle, and bottom) are aggregated together to represent the decision unit and generate annual geomeans. To ensure adequate assimilative capacity, the highest annual geomean for the decision unit shall not exceed 90 percent of the applicable WQS.

The resulting geomeans were:

Year	Result (µg/L)
2008	1.7
2009	2.1
2010	1.2
2011	1.3
2012	1.2

The highest annual geomean for the decision unit of 2.1 µg/L is greater than 90 percent of the applicable WQS (1.8 µg/L). Assimilative capacity is not present in the receiving water.

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [mailto:Sablado.Elizabeth@epa.gov]
Sent: Friday, August 23, 2013 8:48 AM
To: Lum, Darryl C; Poentis, Kris T

Cc: Dan Connally

Subject: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl and Kris,

Here are my comments on the revised Kailua WWTP draft permit:

1. The compliance schedule justification in the fact sheet needs a stronger link between the assessment of the length of this specific schedule, the interim requirements for this specific schedule, and the CFR requirements.
2. There is reference to an accelerated monitoring trigger for ammonia and nitrate+nitrate in footnote 2 to the effluent limit table on page 4 of the permit. Is this carryover from the previous permit's threshold requirement? It doesn't seem relevant here.
3. In the ZOM limits section of the permit – it may not be necessary to include ammonia, since there are already end-of-pipe limits for ammonia and no assimilative capacity is available.
4. Page 19 of the permit, offshore monitoring – it would be good to link these monitoring requirements with the ZOM limits.
5. There is a comment by Dan that the discharge point is 1500 feet north of the ZOM – how did the facility determine the direction/extent of their discharge plume? Is this based on the dilution model from 1985?
6. Page 27 of the permit – the Pretreatment reporting address for EPA should be addressed to the “Regional Pretreatment Coordinator” with the WTR-5 mailcode.
7. Page 39 of the permit discusses that if a sampling result is below the MDL, it should be reported as “0.” Wouldn't it be better to be reported as “ND” or non-detect? I have seen this language in only one other permit – is it new?
8. Page 41 of the permit includes the same sentence twice regarding the sludge reporting requirement to EPA.
9. Why was there no chlorine data? Was the discharger not required to monitor for chlorine in the previous permit? What about a priority pollutant scan?
10. Page 15 of the fact sheet includes a typo: a paragraph starting with “During periods...” should start without those words.
11. Recommend including enterococcus RPA information in the RPA table.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]

Sent: Wednesday, August 14, 2013 1:28 PM

To: Sablad, Elizabeth

Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Friday, August 23, 2013 11:48 AM
To: 'Lum, Darryl C'; 'kris.poentis@doh.hawaii.gov'
Cc: 'Dan Connally'
Subject: Comments on revised draft Kailua WWTP (HI 0021296)

Hi Darryl and Kris,

Here are my comments on the revised Kailua WWTP draft permit:

1. The compliance schedule justification in the fact sheet needs a stronger link between the assessment of the length of this specific schedule, the interim requirements for this specific schedule, and the CFR requirements.
2. There is reference to an accelerated monitoring trigger for ammonia and nitrate+nitrate in footnote 2 to the effluent limit table on page 4 of the permit. Is this carryover from the previous permit's threshold requirement? It doesn't seem relevant here.
3. In the ZOM limits section of the permit – it may not be necessary to include ammonia, since there are already end-of-pipe limits for ammonia and no assimilative capacity is available.
4. Page 19 of the permit, offshore monitoring – it would be good to link these monitoring requirements with the ZOM limits.
5. There is a comment by Dan that the discharge point is 1500 feet north of the ZOM – how did the facility determine the direction/extent of their discharge plume? Is this based on the dilution model from 1985?
6. Page 27 of the permit – the Pretreatment reporting address for EPA should be addressed to the “Regional Pretreatment Coordinator” with the WTR-5 mailcode.
7. Page 39 of the permit discusses that if a sampling result is below the MDL, it should be reported as “0.” Wouldn't it be better to be reported as “ND” or non-detect? I have seen this language in only one other permit – is it new?
8. Page 41 of the permit includes the same sentence twice regarding the sludge reporting requirement to EPA.
9. Why was there no chlorine data? Was the discharger not required to monitor for chlorine in the previous permit? What about a priority pollutant scan?
10. Page 15 of the fact sheet includes a typo: a paragraph starting with “During periods...” should start without those words.
11. Recommend including enterococcus RPA information in the RPA table.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, August 15, 2013 11:08 AM
To: 'Lum, Darryl C'
Subject: RE: Kailua WWTP (HI 0021296)

Hi Darryl,

Thanks! I'll plan on getting comments to you within 2 weeks then. On the grant commitments, I think we would be understanding of those permits in public notice. At this point, I'm not sure what my management would say, but I will definitely provide them all the detail regarding the work you have put in.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, August 15, 2013 11:06 AM
To: Sablad, Elizabeth
Subject: RE: Kailua WWTP (HI 0021296)

Hi Elizabeth,

2 weeks and a phone call sounds good.

Please see attached for the status of the remaining FY 2013 permits. The end of September 2013 is approaching, and we are going to do everything we can to push these permits out. If September 2013 passes and a permit is still in public notice, would EPA take this into consideration?

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Thursday, August 15, 2013 6:09 AM
To: Lum, Darryl C
Cc: Poentis, Kris T
Subject: RE: Kailua WWTP (HI 0021296)

Hi Darryl,

Can you let me know what timeframe I have to review this permit? I would like us to get to a regular schedule, where I have 2 weeks to review a draft permit, with a phone call to agree on any revisions, and then you proceed to public notice without another draft review. I know that has been difficult to do, since there have been a lot of significant changes to these permits, and for me, it is like reviewing a whole new draft permit. Would a 2-week turnaround be okay for this permit? Or do you need it sooner?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Thursday, August 15, 2013 11:06 AM
To: Sablad, Elizabeth
Subject: RE: Kailua WWTP (HI 0021296)
Attachments: Remaining 2013 Permit Issuance Schedule.pdf

Hi Elizabeth,

2 weeks and a phone call sounds good.

Please see attached for the status of the remaining FY 2013 permits. The end of September 2013 is approaching, and we are going to do everything we can to push these permits out. If September 2013 passes and a permit is still in public notice, would EPA take this into consideration?

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]
Sent: Thursday, August 15, 2013 6:09 AM
To: Lum, Darryl C
Cc: Poentis, Kris T
Subject: RE: Kailua WWTP (HI 0021296)

Hi Darryl,

Can you let me know what timeframe I have to review this permit? I would like us to get to a regular schedule, where I have 2 weeks to review a draft permit, with a phone call to agree on any revisions, and then you proceed to public notice without another draft review. I know that has been difficult to do, since there have been a lot of significant changes to these permits, and for me, it is like reviewing a whole new draft permit. Would a 2-week turnaround be okay for this permit? Or do you need it sooner?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)

San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, August 15, 2013 9:09 AM
To: 'Lum, Darryl C'
Cc: 'kris.poentis@doh.hawaii.gov'
Subject: RE: Kailua WWTP (HI 0021296)

Hi Darryl,

Can you let me know what timeframe I have to review this permit? I would like us to get to a regular schedule, where I have 2 weeks to review a draft permit, with a phone call to agree on any revisions, and then you proceed to public notice without another draft review. I know that has been difficult to do, since there have been a lot of significant changes to these permits, and for me, it is like reviewing a whole new draft permit. Would a 2-week turnaround be okay for this permit? Or do you need it sooner?

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Wednesday, August 14, 2013 1:28 PM
To: Sablad, Elizabeth
Cc: kris.poentis@doh.hawaii.gov
Subject: Kailua WWTP (HI 0021296)
Attachments: Kailua WWTP_HI0020117_8-13-2013_Admin Draft Fact Sheet.docx; Kailua WWTP_HI_8-13-2013_Admin Draft Permit.doc

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Takemoto, Jennifer <Jennifer.Takemoto@doh.hawaii.gov>
Sent: Tuesday, August 13, 2013 5:37 PM
To: Sablad, Elizabeth; jeffrey.larson@usmc.mil; Dan.Connally@pgenv.com
Cc: Rossio, Marianne Fuji
Subject: Public Notice Package for NPDES Permit No. HI 0110078, MCBH, Kaneohe Bay Water Reclamation Facility
Attachments: 08041PMR.13.PDF; 08041PMR.13a.doc; 08041PMR.13b.pdf; 08041PMR.13c.pdf

To Whom It may Concern,

Attached is the Public Notice Package for NPDES Permit No. HI 0110078, MCBH, Kaneohe Bay Water Reclamation Facility. If you have questions, please contact Ms. Marianne Rossio at 586-4309.

Thank you,
Jennifer
Clean Water Branch

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Tuesday, August 06, 2013 1:00 PM
To: Dan Connally
Cc: Sablad, Elizabeth; kris.poentis@doh.hawaii.gov
Subject: FY13 Permits

Hi Dan,

Kris will be on vacation from tomorrow (8/7/13) and return on 8/22/13. Please cc me on any of her permits (Honouliuli WWTP, Sand Island WWTP, Kailua WWTP, Wailua WWTP, and Chevron). While she is out I'll send to EPA for review, send PN package, issue final permit, etc.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Rossio, Marianne Fuji <marianne.rossio@doh.hawaii.gov>
Sent: Thursday, July 18, 2013 10:40 AM
To: Sablad, Elizabeth
Subject: RE: Comments on draft MCB Kaneohe Bay WRF permit

Hi Elizabeth,

Thank you for your comments and the quick response. We will go over them and contact you should we have any questions.

Thanks again,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Wednesday, July 17, 2013 10:35 AM
To: Rossio, Marianne Fuji
Cc: Lum, Darryl C; Dan Connally
Subject: Comments on draft MCB Kaneohe Bay WRF permit

Hi Marianne,

See my comments below on the draft permit for MCB Kaneohe Bay WRF. I hope you find them useful. Thanks for sending the permit to me for review prior to public notice! Let me know if you have any questions.

Sincerely,
Elizabeth

Comments on MCB Kaneohe Bay WRF preliminary draft permit:

Permit:

1. Recommend not splitting effluent limit table between TSS and remaining effluent limits.
2. Make sure the actual dates are included for the compliance schedule milestones based on the effective date.
3. Recommend removal of Task 12 for compliance schedule, as a compliance schedule's interim requirements/milestones need to ensure that compliance will be met by the final compliance deadline (no

delays accounted for beyond final compliance deadline, except that within the timeframe provided, milestone dates can be changed with a minor modification of the permit).

4. Not clear what permittee is responsible regarding receiving water monitoring, since it is performed by Kailua WWTP. How does DOH determine compliance with receiving water limits for this facility when there is a shared outfall? Should the monitoring requirements on page 21 be linked to the receiving water limits?
5. Not clear how DOH will assess ZOM dilution and assimilative capacity studies from both this permittee and Kailua WWTP since share outfall (is Kailua being required to do one? For same or different pollutants?). It seems like these might need to be coordinated.
6. Page 36 requires an outdated requirement for data to be included in STORET. Please update with requirements we discussed on Sand Island permit. Also, no influent or effluent data is necessary for this requirement.
7. This is coming from my lack of knowledge on NetDMR, but are reports required on the 15th day or 28th day following?
8. Page 37 indicates a pretreatment report be sent to EPA RA. This is not necessary, as this facility is not subject to the federal pretreatment requirements.
9. Page 41, section J.5 discusses chlorine usage. Should total residual chlorine be assessed for RP? Do they already chlorinate, or is it just one option they might consider in the future to meet the new enterococcus limits?
10. Page 41, section J.5.a.(4): not clear how this syncs with the effluent and receiving water monitoring requirements already in the permit.

Fact Sheet:

1. There is insufficient information included in the fact sheet to demonstrate that the compliance schedule meets the requirements of 40 CFR 122.47. The fact sheet must explain why a compliance schedule is appropriate and demonstrate that the milestones and length of the schedule meet the requirements of 40 CFR 122.47. The fact sheet must demonstrate that the compliance schedule will lead to compliance with the final effluent limitations “as soon as possible” and that the interim milestones are action-based and sufficient to ensure compliance at the end of the schedule. In making the determination that the compliance schedule meets 40 CFR 122.47 requirements, DOH must consider the specific steps needed to modify or install treatment facilities, operations or other measures and the time those steps would take.
2. Page 3: please remove CWA date for prevent potential enforceability issues.
3. Page 12 discusses a 1985 dilution model: which model was used?
4. Page 20: take out “the removal of” under the ammonia assimilative capacity assessment regarding additional information to be consistent with the determination.
5. Further explanation is needed regarding how utilizing the 10% WQS as a single sample maximum also protects the 2% WQS.
6. Page 24 under enterococcus discussion mentions an EPA TDD. Typo?
7. Recommend additional justification for use of 185:1 dilution for enterococcus as used in the past (acute illness, etc.).

8. Page 33 includes the offshore data for turbidity and chlor-a, and this data appears to show exceedances of the WQS for these parameters at both the ZOM and control stations. How is DOH implementing these WQS?

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]
Sent: Thursday, July 11, 2013 10:58 AM
To: Sablad, Elizabeth
Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

Thanks for the email. Sorry to flood you with permits. End of next week will work for us.

Thanks again,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Thursday, July 11, 2013 6:32 AM
To: Rossio, Marianne Fuji
Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Thanks, Marianne,
I just received a bunch of permits from you all, but I might be able to give you comments by the end of next week. Does that work?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]
Sent: Wednesday, July 10, 2013 1:10 PM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; Dan Connally
Subject: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

We are forwarding to you the draft permit and fact sheet for the Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility. We will go to public notice after you have completed your review.

Thank you,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablado, Elizabeth

From: Dan Connally <dan.connally@pgenv.com>
Sent: Wednesday, July 17, 2013 1:37 PM
To: Sablado, Elizabeth; Rossio, Marianne Fuji
Cc: Lum, Darryl C
Subject: RE: Comments on draft MCB Kaneohe Bay WRF permit

I'll jump on these tomorrow morning. I haven't read through them all, but I'm assuming many are similar to Chevron and I will address as we discussed today. For any comments that are unclear, I will follow up with an email.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Wednesday, July 17, 2013 4:35 PM
To: Rossio, Marianne Fuji
Cc: Lum, Darryl C; Dan Connally
Subject: Comments on draft MCB Kaneohe Bay WRF permit

Hi Marianne,

See my comments below on the draft permit for MCB Kaneohe Bay WRF. I hope you find them useful. Thanks for sending the permit to me for review prior to public notice! Let me know if you have any questions.

Sincerely,
Elizabeth

Comments on MCB Kaneohe Bay WRF preliminary draft permit:

Permit:

1. Recommend not splitting effluent limit table between TSS and remaining effluent limits.
2. Make sure the actual dates are included for the compliance schedule milestones based on the effective date.
3. Recommend removal of Task 12 for compliance schedule, as a compliance schedule's interim requirements/milestones need to ensure that compliance will be met by the final compliance deadline (no delays accounted for beyond final compliance deadline, except that within the timeframe provided, milestone dates can be changed with a minor modification of the permit).
4. Not clear what permittee is responsible regarding receiving water monitoring, since it is performed by Kailua WWTP. How does DOH determine compliance with receiving water limits for this facility when there is a shared outfall? Should the monitoring requirements on page 21 be linked to the receiving water limits?

5. Not clear how DOH will assess ZOM dilution and assimilative capacity studies from both this permittee and Kailua WWTP since share outfall (is Kailua being required to do one? For same or different pollutants?). It seems like these might need to be coordinated.
6. Page 36 requires an outdated requirement for data to be included in STORET. Please update with requirements we discussed on Sand Island permit. Also, no influent or effluent data is necessary for this requirement.
7. This is coming from my lack of knowledge on NetDMR, but are reports required on the 15th day or 28th day following?
8. Page 37 indicates a pretreatment report be sent to EPA RA. This is not necessary, as this facility is not subject to the federal pretreatment requirements.
9. Page 41, section J.5 discusses chlorine usage. Should total residual chlorine be assessed for RP? Do they already chlorinate, or is it just one option they might consider in the future to meet the new enterococcus limits?
10. Page 41, section J.5.a.(4): not clear how this syncs with the effluent and receiving water monitoring requirements already in the permit.

Fact Sheet:

1. There is insufficient information included in the fact sheet to demonstrate that the compliance schedule meets the requirements of 40 CFR 122.47. The fact sheet must explain why a compliance schedule is appropriate and demonstrate that the milestones and length of the schedule meet the requirements of 40 CFR 122.47. The fact sheet must demonstrate that the compliance schedule will lead to compliance with the final effluent limitations “as soon as possible” and that the interim milestones are action-based and sufficient to ensure compliance at the end of the schedule. In making the determination that the compliance schedule meets 40 CFR 122.47 requirements, DOH must consider the specific steps needed to modify or install treatment facilities, operations or other measures and the time those steps would take.
2. Page 3: please remove CWA date for prevent potential enforceability issues.
3. Page 12 discusses a 1985 dilution model: which model was used?
4. Page 20: take out “the removal of” under the ammonia assimilative capacity assessment regarding additional information to be consistent with the determination.
5. Further explanation is needed regarding how utilizing the 10% WQS as a single sample maximum also protects the 2% WQS.
6. Page 24 under enterococcus discussion mentions an EPA TDD. Typo?
7. Recommend additional justification for use of 185:1 dilution for enterococcus as used in the past (acute illness, etc.).
8. Page 33 includes the offshore data for turbidity and chlor-a, and this data appears to show exceedances of the WQS for these parameters at both the ZOM and control stations. How is DOH implementing these WQS?

NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]
Sent: Thursday, July 11, 2013 10:58 AM
To: Sablad, Elizabeth
Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

Thanks for the email. Sorry to flood you with permits. End of next week will work for us.

Thanks again,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Thursday, July 11, 2013 6:32 AM
To: Rossio, Marianne Fuji
Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Thanks, Marianne,
I just received a bunch of permits from you all, but I might be able to give you comments by the end of next week. Does that work?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]

Sent: Wednesday, July 10, 2013 1:10 PM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; Dan Connally

Subject: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

We are forwarding to you the draft permit and fact sheet for the Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility. We will go to public notice after you have completed your review.

Thank you,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Wednesday, July 17, 2013 1:35 PM
To: 'Rossio, Marianne Fuji'
Cc: 'Lum, Darryl C'; 'Dan Connally'
Subject: Comments on draft MCB Kaneohe Bay WRF permit

Hi Marianne,

See my comments below on the draft permit for MCB Kaneohe Bay WRF. I hope you find them useful. Thanks for sending the permit to me for review prior to public notice! Let me know if you have any questions.

Sincerely,
Elizabeth

Comments on MCB Kaneohe Bay WRF preliminary draft permit:

Permit:

1. Recommend not splitting effluent limit table between TSS and remaining effluent limits.
2. Make sure the actual dates are included for the compliance schedule milestones based on the effective date.
3. Recommend removal of Task 12 for compliance schedule, as a compliance schedule's interim requirements/milestones need to ensure that compliance will be met by the final compliance deadline (no delays accounted for beyond final compliance deadline, except that within the timeframe provided, milestone dates can be changed with a minor modification of the permit).
4. Not clear what permittee is responsible regarding receiving water monitoring, since it is performed by Kailua WWTP. How does DOH determine compliance with receiving water limits for this facility when there is a shared outfall? Should the monitoring requirements on page 21 be linked to the receiving water limits?
5. Not clear how DOH will assess ZOM dilution and assimilative capacity studies from both this permittee and Kailua WWTP since share outfall (is Kailua being required to do one? For same or different pollutants?). It seems like these might need to be coordinated.
6. Page 36 requires an outdated requirement for data to be included in STORET. Please update with requirements we discussed on Sand Island permit. Also, no influent or effluent data is necessary for this requirement.
7. This is coming from my lack of knowledge on NetDMR, but are reports required on the 15th day or 28th day following?
8. Page 37 indicates a pretreatment report be sent to EPA RA. This is not necessary, as this facility is not subject to the federal pretreatment requirements.
9. Page 41, section J.5 discusses chlorine usage. Should total residual chlorine be assessed for RP? Do they already chlorinate, or is it just one option they might consider in the future to meet the new enterococcus limits?
10. Page 41, section J.5.a.(4): not clear how this syncs with the effluent and receiving water monitoring requirements already in the permit.

Fact Sheet:

1. There is insufficient information included in the fact sheet to demonstrate that the compliance schedule meets the requirements of 40 CFR 122.47. The fact sheet must explain why a compliance schedule is appropriate and demonstrate that the milestones and length of the schedule meet the requirements of 40 CFR 122.47. The fact sheet must demonstrate that the compliance schedule will lead to compliance with the final effluent limitations "as soon as possible" and that the interim milestones are action-based and sufficient to ensure compliance at the end of the schedule. In making the determination that the compliance schedule meets 40 CFR 122.47 requirements, DOH must consider the specific steps needed to modify or install treatment facilities, operations or other measures and the time those steps would take.
2. Page 3: please remove CWA date for prevent potential enforceability issues.
3. Page 12 discusses a 1985 dilution model: which model was used?
4. Page 20: take out "the removal of" under the ammonia assimilative capacity assessment regarding additional information to be consistent with the determination.
5. Further explanation is needed regarding how utilizing the 10% WQS as a single sample maximum also protects the 2% WQS.
6. Page 24 under enterococcus discussion mentions an EPA TDD. Typo?
7. Recommend additional justification for use of 185:1 dilution for enterococcus as used in the past (acute illness, etc.).
8. Page 33 includes the offshore data for turbidity and chlor-a, and this data appears to show exceedances of the WQS for these parameters at both the ZOM and control stations. How is DOH implementing these WQS?

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]

Sent: Thursday, July 11, 2013 10:58 AM

To: Sablad, Elizabeth

Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

Thanks for the email. Sorry to flood you with permits. End of next week will work for us.

Thanks again,
Marianne

Marianne Rossio
Environmental Engineer

Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Thursday, July 11, 2013 6:32 AM
To: Rossio, Marianne Fuji
Subject: RE: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Thanks, Marianne,
I just received a bunch of permits from you all, but I might be able to give you comments by the end of next week. Does that work?

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

From: Rossio, Marianne Fuji [<mailto:marianne.rossio@doh.hawaii.gov>]
Sent: Wednesday, July 10, 2013 1:10 PM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; Dan Connally
Subject: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility

Hi Elizabeth,

We are forwarding to you the draft permit and fact sheet for the Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility. We will go to public notice after you have completed your review.

Thank you,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Rossio, Marianne Fuji <marianne.rossio@doh.hawaii.gov>
Sent: Wednesday, July 10, 2013 1:10 PM
To: Sablad, Elizabeth
Cc: Lum, Darryl C; Dan Connally
Subject: NPDES Permit No. HI 0110078 Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility
Attachments: MCBH Kaneohe Bay WRF_HI0110078_7-8-2013_Admin Draft Fact Sheet.docx; MCBH Kaneohe Bay WRF_HI_7-8-2013_Admin Draft Permit.doc

Hi Elizabeth,

We are forwarding to you the draft permit and fact sheet for the Marine Corps Base Hawaii, Kaneohe Bay Water Reclamation Facility. We will go to public notice after you have completed your review.

Thank you,
Marianne

Marianne Rossio
Environmental Engineer
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Tuesday, May 07, 2013 8:55 AM
To: alec.wong@doh.hawaii.gov; 'Lum, Darryl C'; Smith, DavidW
Cc: Woo, Nancy; Yin, Christina
Subject: HI Permits Session detailed agenda for tomorrow
Attachments: May 2013 HI NPDES Permits Session Agenda.doc

Hi Alec, Darryl,

Attached is a detailed agenda for our discussion tomorrow at 11am HST/ 2pm PST. It is long, so we may have to postpone discussion of some of the technical items to another meeting. Please let me know what phone number to reach you. Otherwise, I will just call the main line. Also, please let me know if you have any questions or concerns about the agenda. Talk to you tomorrow.

Sincerely,
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Monday, May 06, 2013 12:13 PM
To: 'Lum, Darryl C'
Cc: alec.wong@doh.hawaii.gov; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, I already have contractor support on the agenda and we can decide which permits later. I just wanted to understand how many permits you were requesting support for.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Monday, May 06, 2013 12:10 PM
To: Sablad, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

We didn't decide on the other 3 contractor support permits yet. Could this be added as a discussion topic?

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 9:01 AM
To: Lum, Darryl C
Cc: Wong, Alec Y; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,
I'm confused, since Alec recently sent Sara an updated request for \$100,000 of contract support, which is equivalent to approximately 5 permits. Please clarify.

I will make sure these items are on the agenda.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Monday, May 06, 2013 10:58 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

1. Please see attached for the 2014 schedule. The 2 highlighted permits (East Honolulu WWTP and Kahului Generating Station) are contractor assistance.
2. Nutrient/ZOM Issue Summary: DOH believes that it is not appropriate to establish end of pipe limits (WQS x dilution factor) for pollutants that have assimilative capacity. 40 CFR 122.44(d) requires limits for all pollutants with a reasonable potential to exceed WQS. However, it does not state that the limits need to be WQS x dilution factor and/or end of pipe. DOH believes that a performance based end of pipe limit is more appropriate if there is assimilative capacity.
3. DOH also believes that when there is insufficient information (e.g. applicant does not have a dilution factor that represents conditions at the edge of the ZOM), end of pipe limits should not be set in the permit. Conditions should be placed in the permit to require additional dilution studies/monitoring. This additional information can be utilized during the next permit to set end of pipe limits. DOH would also like to discuss the possibility of placing a re-opener clause in the permit when the new dilution study/monitoring is completed.
4. We would like to discuss TIE/TRE.
5. We would like to discuss Intake credit approval.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 5:51 AM
To: Lum, Darryl C
Cc: Smith, DavidW; Wong, Alec Y
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,

I am working on an agenda for our meeting on Wednesday and hope to send it out later today. Could you please provide your proposed FY14 permit issuance list, including contractor assistance, and a brief layout of the nutrient/ZOM issue before our discussion on Wednesday? Thanks!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.

We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

Sablado, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Monday, May 06, 2013 12:10 PM
To: Sablado, Elizabeth
Cc: alec.wong@doh.hawaii.gov; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

We didn't decide on the other 3 contractor support permits yet. Could this be added as a discussion topic?

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 9:01 AM
To: Lum, Darryl C
Cc: Wong, Alec Y; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,
I'm confused, since Alec recently sent Sara an updated request for \$100,000 of contract support, which is equivalent to approximately 5 permits. Please clarify.

I will make sure these items are on the agenda.

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Monday, May 06, 2013 10:58 AM

To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

1. Please see attached for the 2014 schedule. The 2 highlighted permits (East Honolulu WWTP and Kahului Generating Station) are contractor assistance.
2. Nutrient/ZOM Issue Summary: DOH believes that it is not appropriate to establish end of pipe limits (WQS x dilution factor) for pollutants that have assimilative capacity. 40 CFR 122.44(d) requires limits for all pollutants with a reasonable potential to exceed WQS. However, it does not state that the limits need to be WQS x dilution factor and/or end of pipe. DOH believes that a performance based end of pipe limit is more appropriate if there is assimilative capacity.
3. DOH also believes that when there is insufficient information (e.g. applicant does not have a dilution factor that represents conditions at the edge of the ZOM), end of pipe limits should not be set in the permit. Conditions should be placed in the permit to require additional dilution studies/monitoring. This additional information can be utilized during the next permit to set end of pipe limits. DOH would also like to discuss the possibility of placing a re-opener clause in the permit when the new dilution study/monitoring is completed.
4. We would like to discuss TIE/TRE.
5. We would like to discuss Intake credit approval.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 5:51 AM
To: Lum, Darryl C
Cc: Smith, DavidW; Wong, Alec Y
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,

I am working on an agenda for our meeting on Wednesday and hope to send it out later today. Could you please provide your proposed FY14 permit issuance list, including contractor assistance, and a brief layout of the nutrient/ZOM issue before our discussion on Wednesday? Thanks!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]

Sent: Thursday, May 02, 2013 7:13 AM

To: Lum, Darryl C; Wong, Alec Y

Cc: Smith, DavidW

Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,

Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Monday, May 06, 2013 12:01 PM
To: 'Lum, Darryl C'
Cc: alec.wong@doh.hawaii.gov; Smith, DavidW
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,

I'm confused, since Alec recently sent Sara an updated request for \$100,000 of contract support, which is equivalent to approximately 5 permits. Please clarify.

I will make sure these items are on the agenda.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Monday, May 06, 2013 10:58 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

1. Please see attached for the 2014 schedule. The 2 highlighted permits (East Honolulu WWTP and Kahului Generating Station) are contractor assistance.
2. Nutrient/ZOM Issue Summary: DOH believes that it is not appropriate to establish end of pipe limits (WQS x dilution factor) for pollutants that have assimilative capacity. 40 CFR 122.44(d) requires limits for all pollutants with a reasonable potential to exceed WQS. However, it does not state that the limits need to be WQS x dilution factor and/or end of pipe. DOH believes that a performance based end of pipe limit is more appropriate if there is assimilative capacity.
3. DOH also believes that when there is insufficient information (e.g. applicant does not have a dilution factor that represents conditions at the edge of the ZOM), end of pipe limits should not be set in the permit. Conditions should be placed in the permit to require additional dilution studies/monitoring. This additional information can be utilized during the next permit to set end of pipe limits. DOH would also like to discuss the possibility of placing a re-opener clause in the permit when the new dilution study/monitoring is completed.
4. We would like to discuss TIE/TRE.
5. We would like to discuss Intake credit approval.

Thanks,

Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 5:51 AM
To: Lum, Darryl C
Cc: Smith, DavidW; Wong, Alec Y
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,
I am working on an agenda for our meeting on Wednesday and hope to send it out later today. Could you please provide your proposed FY14 permit issuance list, including contractor assistance, and a brief layout of the nutrient/ZOM issue before our discussion on Wednesday? Thanks!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)

San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Monday, May 06, 2013 10:58 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call
Attachments: 2014 schedule.pdf

Hi Elizabeth,

1. Please see attached for the 2014 schedule. The 2 highlighted permits (East Honolulu WWTP and Kahului Generating Station) are contractor assistance.
2. Nutrient/ZOM Issue Summary: DOH believes that it is not appropriate to establish end of pipe limits (WQS x dilution factor) for pollutants that have assimilative capacity. 40 CFR 122.44(d) requires limits for all pollutants with a reasonable potential to exceed WQS. However, it does not state that the limits need to be WQS x dilution factor and/or end of pipe. DOH believes that a performance based end of pipe limit is more appropriate if there is assimilative capacity.
3. DOH also believes that when there is insufficient information (e.g. applicant does not have a dilution factor that represents conditions at the edge of the ZOM), end of pipe limits should not be set in the permit. Conditions should be placed in the permit to require additional dilution studies/monitoring. This additional information can be utilized during the next permit to set end of pipe limits. DOH would also like to discuss the possibility of placing a re-opener clause in the permit when the new dilution study/monitoring is completed.
4. We would like to discuss TIE/TRE.
5. We would like to discuss Intake credit approval.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Monday, May 06, 2013 5:51 AM
To: Lum, Darryl C
Cc: Smith, DavidW; Wong, Alec Y
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,

I am working on an agenda for our meeting on Wednesday and hope to send it out later today. Could you please provide your proposed FY14 permit issuance list, including contractor assistance, and a brief layout of the nutrient/ZOM issue before our discussion on Wednesday? Thanks!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum

Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablاد.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablاد.elizabeth@epa.gov

Sablad, Elizabeth

From: Wong, Alec Y <alec.wong@doh.hawaii.gov>
Sent: Monday, May 06, 2013 10:29 AM
To: Smith, DavidW
Cc: Sablad, Elizabeth; Roser, Sara; Lum, Darryl C
Subject: RE: HI Permit Issues

Hi David,

Please provide DOH the procedures to appeal your decision.

Thanks!

Alec Wong
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, and dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Smith, DavidW [<mailto:Smith.DavidW@epa.gov>]
Sent: Wednesday, May 01, 2013 12:48 PM
To: Wong, Alec Y
Cc: Sablad, Elizabeth; Roser, Sara
Subject: HI Permit Issues

Hi Alec- Thanks for speaking with me today. We should absolutely put on our agenda for next week both the issues associated with developing permit limits for nutrients and the associated mixing zone analysis issues, as well as the EPA decision to withhold payment of \$15,000 in grant funds due to failure to meet permit completion commitments in the 106 workplan. Regarding the latter issue, we will be prepared to go over the timeline on these permits and compare it to workplan commitments. As we discussed, we have decided to withhold grant funds as follows:

- \$10,000 for failure to issue Pearl Harbor Naval Shipyard permit on time and due to the extensive delays in releasing a PN draft permit.
- \$5,000 for failure to issue Kailua WWTP permit on time and due to the extensive delays in releasing a PN draft permit.

Of course, we also look forward to discussing the status of other permits in process and coming up later this year as well.

Many thanks. Please let me know if you have questions.

David Smith
Manager
NPDES Permits Office (WTR-5)
U.S. EPA Region 9
75 Hawthorne Street

San Francisco, CA 94602
(415) 972-3464 (office)
(415) 972-947-3545 (fax)

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Monday, May 06, 2013 8:51 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,

I am working on an agenda for our meeting on Wednesday and hope to send it out later today. Could you please provide your proposed FY14 permit issuance list, including contractor assistance, and a brief layout of the nutrient/ZOM issue before our discussion on Wednesday? Thanks!

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablاد.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablاد.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 2:10 PM
To: Woo, Nancy; Yin, Christina; Slay, Hudson
Subject: FW: HI NPDES May Grant Negotiations Call

FYI – Our NPDES session is scheduled for Wednesday, May 8th at 2pm PST. See initial agenda at bottom of chain.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablade.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablade.elizabeth@epa.gov

Sablado, Elizabeth

From: Sablado, Elizabeth
Sent: Thursday, May 02, 2013 11:18 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Yes, my coworker graciously agreed to move his meeting with Dave, so we are set for Wednesday (5/8/13) at 11am HST/2pm PST.

Please let us know if you want to add any agenda items and what number we can reach you at.

-Elizabeth

Elizabeth Sablado
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablado, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablado, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y

Cc: Smith, DavidW

Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,

Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablado, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 10:32 AM
To: 'Lum, Darryl C'
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Darryl,
Dave has another meeting then. I'll check with him and get back to you.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablado.elizabeth@epa.gov

From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,

Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Thursday, May 02, 2013 10:26 AM
To: Sablad, Elizabeth
Cc: Smith, DavidW; alec.wong@doh.hawaii.gov
Subject: RE: HI NPDES May Grant Negotiations Call

Hi Elizabeth,

Can the call be scheduled for Wednesday (5/8/13) at 11 am HST?

On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.
We are not available on Thursday (5/9/13).

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Thursday, May 02, 2013 7:13 AM
To: Lum, Darryl C; Wong, Alec Y
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 10:13 AM
To: Lum, Darryl C; alec.wong@doh.hawaii.gov
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,

Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Thursday, May 02, 2013 10:13 AM
To: 'Lum, Darryl C'; alec.wong@doh.hawaii.gov
Cc: Smith, DavidW
Subject: HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,

Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

-Elizabeth

1. FY13 Permit Issuance Performance Status (including General Permits rule)
 - a. Implementation of the grant condition for failure to meet 106 grant workplan commitments (specifically: Pearl Harbor Naval Shipyard and Kailua WWTP permits)
2. FY14 Permit Issuance Commitments
3. FY14 Contract Assistance
4. Developing permit limits for nutrients and associated mixing zone analysis issues

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Smith, DavidW
Sent: Wednesday, May 01, 2013 3:48 PM
To: alec.wong@doh.hawaii.gov
Cc: Sablad, Elizabeth; Roser, Sara
Subject: HI Permit Issues

Hi Alec- Thanks for speaking with me today. We should absolutely put on our agenda for next week both the issues associated with developing permit limits for nutrients and the associated mixing zone analysis issues, as well as the EPA decision to withhold payment of \$15,000 in grant funds due to failure to meet permit completion commitments in the 106 workplan. Regarding the latter issue, we will be prepared to go over the timeline on these permits and compare it to workplan commitments. As we discussed, we have decided to withhold grant funds as follows:

- \$10,000 for failure to issue Pearl Harbor Naval Shipyard permit on time and due to the extensive delays in releasing a PN draft permit.
- \$5,000 for failure to issue Kailua WWTP permit on time and due to the extensive delays in releasing a PN draft permit.

Of course, we also look forward to discussing the status of other permits in process and coming up later this year as well.

Many thanks. Please let me know if you have questions.

David Smith
Manager
NPDES Permits Office (WTR-5)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94602
(415) 972-3464 (office)
(415) 972-947-3545 (fax)

Sablado, Elizabeth

From: Smith, DavidW
Sent: Wednesday, May 01, 2013 3:48 PM
To: alec.wong@doh.hawaii.gov
Cc: Sablado, Elizabeth; Roser, Sara
Subject: HI Permit Issues

Hi Alec- Thanks for speaking with me today. We should absolutely put on our agenda for next week both the issues associated with developing permit limits for nutrients and the associated mixing zone analysis issues, as well as the EPA decision to withhold payment of \$15,000 in grant funds due to failure to meet permit completion commitments in the 106 workplan. Regarding the latter issue, we will be prepared to go over the timeline on these permits and compare it to workplan commitments. As we discussed, we have decided to withhold grant funds as follows:

- \$10,000 for failure to issue Pearl Harbor Naval Shipyard permit on time and due to the extensive delays in releasing a PN draft permit.
- \$5,000 for failure to issue Kailua WWTP permit on time and due to the extensive delays in releasing a PN draft permit.

Of course, we also look forward to discussing the status of other permits in process and coming up later this year as well.

Many thanks. Please let me know if you have questions.

David Smith

Manager

NPDES Permits Office (WTR-5)

U.S. EPA Region 9

75 Hawthorne Street

San Francisco, CA 94602

(415) 972-3464 (office)

(415) 972-947-3545 (fax)

Sablado, Elizabeth

From: Dan Connally <dan.connally@pgenv.com>
Sent: Wednesday, March 06, 2013 12:10 PM
To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C
Subject: RE: Comments on Kailua Regional WWTP predraft permit

Hey Kris,

I'll look these over and contact you early next week to discuss. I will make necessary revisions next week.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [<mailto:Sablado.Elizabeth@epa.gov>]
Sent: Wednesday, March 06, 2013 3:08 PM
To: Poentis, Kris T; Lum, Darryl C
Cc: Dan Connally
Subject: Comments on Kailua Regional WWTP predraft permit

Hi Kris,

Here are our comments on the predraft permit for the Kailua Regional WWTP. One thing that I realized that should be changed within the Sand Island permit as well, is that mass-based limits should be included in addition to concentration-based limits for any nutrients that are limited in the permit. For the purpose of organization, I separated out comments that were repeats from the Sand Island draft.

Please let me know when you would like to discuss these comments.

Sincerely,
Elizabeth

Comments on Kailua Regional WWTP preliminary draft permit:

1. Mass-based limits (in addition to concentration-based limits) should be included for nutrients that have demonstrated RP.
2. The comment on page 3 indicates a design flow of 15.25mgd, but the permit is based on a flow of 12.7mgd. If the permit will be changed to be based on a flow of 15.25mgd, an antidegradation analysis is necessary.
3. Table F-5 should include the RPA for enterococcus (and possibly pH?).

4. Fact Sheet page 13: the list of pollutants for which there is no data includes pollutants which are not on the list in Appendix 1 of the permit. Which list is used for priority pollutants?
5. Fact Sheet page 16 includes two different MDELs for chlordane – is this a typo?
6. Fact Sheet page 17 includes an incorrect MDEL for dieldrin – is this a typo?
7. Recommend that antibacksliding justification for pollutants with new effluent limits state that they are new (which also means there is no backsliding).
8. Fact Sheet page 21: the paragraphs that explain both RP and WQBELs for enterococcus are unclear. Why is the WQS for the RPA different than the geometric effluent limit?
9. Can you explain how effluent limits are derived for nutrients? Is it strictly the WQS*dilution? If so, I am not coming up with the same numbers.

Similar to comments on Sand Island predraft:

10. The 10% triggers for nutrients should be changed to effluent limits per Hawaii's latest nutrient implementation approach. The fact sheet discussions for each nutrient should also reflect this change.
11. I recommend additional justification for the use of *T. gratilla* be included in the fact sheet in light of recent contested permits.
12. Page 36 includes MDL and ML requirements. Where did this language come from? It looks like California permit language...we should discuss whether this is applicable to Hawaii permits.
13. Fact Sheet, page 5 includes sentence that says the discharge regulated by the permit is not expected to contribute to impairment. This is a little too definitive. I recommend removal.
14. Fact Sheet page 21 should be clarified that EPA promulgated enterococcus criteria for Hawaii beyond the 300 meter mark and that these are applicable water quality standards. In addition to the geometric mean, a thorough explanation of which single sample maximum applies should be included.
15. Fact Sheet page 21 should explain the applicability of dilution for enterococcus.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Wednesday, March 06, 2013 12:08 PM
To: 'Poentis, Kris T'; 'Lum, Darryl C'
Cc: 'Dan Connally'
Subject: Comments on Kailua Regional WWTP predraft permit

Hi Kris,

Here are our comments on the predraft permit for the Kailua Regional WWTP. One thing that I realized that should be changed within the Sand Island permit as well, is that mass-based limits should be included in addition to concentration-based limits for any nutrients that are limited in the permit. For the purpose of organization, I separated out comments that were repeats from the Sand Island draft.

Please let me know when you would like to discuss these comments.

Sincerely,
Elizabeth

Comments on Kailua Regional WWTP preliminary draft permit:

1. Mass-based limits (in addition to concentration-based limits) should be included for nutrients that have demonstrated RP.
2. The comment on page 3 indicates a design flow of 15.25mgd, but the permit is based on a flow of 12.7mgd. If the permit will be changed to be based on a flow of 15.25mgd, an antidegradation analysis is necessary.
3. Table F-5 should include the RPA for enterococcus (and possibly pH?).
4. Fact Sheet page 13: the list of pollutants for which there is no data includes pollutants which are not on the list in Appendix 1 of the permit. Which list is used for priority pollutants?
5. Fact Sheet page 16 includes two different MDELs for chlordane – is this a typo?
6. Fact Sheet page 17 includes an incorrect MDEL for dieldrin – is this a typo?
7. Recommend that antibacksliding justification for pollutants with new effluent limits state that they are new (which also means there is no backsliding).
8. Fact Sheet page 21: the paragraphs that explain both RP and WQBELs for enterococcus are unclear. Why is the WQS for the RPA different than the geometric mean effluent limit?
9. Can you explain how effluent limits are derived for nutrients? Is it strictly the WQS*dilution? If so, I am not coming up with the same numbers.

Similar to comments on Sand Island predraft:

10. The 10% triggers for nutrients should be changed to effluent limits per Hawaii's latest nutrient implementation approach. The fact sheet discussions for each nutrient should also reflect this change.
11. I recommend additional justification for the use of *T. gratilla* be included in the fact sheet in light of recent contested permits.

12. Page 36 includes MDL and ML requirements. Where did this language come from? It looks like California permit language...we should discuss whether this is applicable to Hawaii permits.
13. Fact Sheet, page 5 includes sentence that says the discharge regulated by the permit is not expected to contribute to impairment. This is a little too definitive. I recommend removal.
14. Fact Sheet page 21 should be clarified that EPA promulgated enterococcus criteria for Hawaii beyond the 300 meter mark and that these are applicable water quality standards. In addition to the geometric mean, a thorough explanation of which single sample maximum applies should be included.
15. Fact Sheet page 21 should explain the applicability of dilution for enterococcus.

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

Sablad, Elizabeth

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>
Sent: Wednesday, March 06, 2013 10:50 AM
To: Sablad, Elizabeth; Dan.Connally@pgenv.com
Cc: kris.poentis@doh.hawaii.gov
Subject: FW: KRWWTWP draft permit

Hi Elizabeth and Dan,

We gave the CCH a 7 day extension to submit Kailua WWTP draft permit comments. We told them their comments are due 3/13/13. The City told us they just received the draft permit yesterday afternoon.

We did not send them the public notice package yet. If needed, we can postpone the 3/21/13 public notice date.

Thanks,
Darryl

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Lum, Darryl C
Sent: Wednesday, March 06, 2013 8:45 AM
To: 'rtanimoto@honolulu.gov'
Cc: Gill, Gary L.; Yamada, Stuart H (stuart.yamada@doh.hawaii.gov); Wong, Alec Y (alec.wong@doh.hawaii.gov); 'lkahikina@honolulu.gov'
Subject: FW: KRWWTWP draft permit

Dear Mr. Tanimoto,

The draft NPDES permit for the Kailua WWTP was mailed on 2/20/13. (Please see attached.) It is our understanding that due to City internal reasons, the draft permit was received by your staff yesterday afternoon.

The draft NPDES permit is not a required permit processing step. We sent the draft as a courtesy to provide the City with extra time to review and comment before the public notice. After the public notice there is a 30 day period for the public (including the applicant) to submit comments.

Since we are assuming that your comments will be similar to the Sand Island WWTP draft permit, we are granting a seven (7) calendar day extension to submit comments on the draft permit. Please submit any draft permit comments by **March 13, 2013**.

Please call or email me if you have any questions.

Thanks,

Darryl Lum
Clean Water Branch
State of Hawaii Department of Health
Phone: (808) 586-4309
Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

-----Original Message-----

From: Tanimoto, Ross [<mailto:rtanimoto@honolulu.gov>]
Sent: Tuesday, March 05, 2013 9:57 PM
To: Wong, Alec Y
Cc: Kahikina, Lori M K; Gill, Gary L.; Yamada, Stuart H
Subject: KRWWTTP draft permit

We just got a proposed draft permit for krwwtp today...comments are due tomorrow. I think this is a bit too demanding. Can we get an extension such that we can properly address the draft permit contents. Like SIWWTP, there are effluent nutrient limits in the micro grams per liter....the most stringent nutrient limits are in the mg/L range (ie, the DOH proposed nutrient effluent limits for KRWWTTP and SIWWTP are a thousand time cleaner than the best current treatment processes). I am shocked at the motive for such exceptional effluent quality....we are extremely interested in what's motivating these ug/L end of pipe effluent limits?!?!? Not to mention the 24 hour turn around request.

We request again an extension so that we may examine the proposed KRWWTTP permit contents. Thank you in advance!

Ross

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Wednesday, March 06, 2013 9:26 AM
To: 'Poentis, Kris T'
Cc: 'Lum, Darryl C'
Subject: RE: Kailua WWTP

Hi Kris,

Most of my comments will be the same as those on Sand Island – was actually planning to just refer to those and add a few permit-specific ones. I'll be sending them along today. Regarding pushing back the public notice, that's up to DOH.

-Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Poentis, Kris T [<mailto:kris.poentis@doh.hawaii.gov>]
Sent: Wednesday, March 06, 2013 9:21 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua WWTP

Hi Elizabeth!

I was wondering how extensive your comments will be and if it's ok with you to push back the public notice date one week. The original date is March 21st but the City called yesterday and told Darryl that they only got the draft yesterday. Thanks!

Kris

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Wednesday, March 06, 2013 9:21 AM
To: Sablad, Elizabeth
Cc: Lum, Darryl C
Subject: Kailua WWTP

Hi Elizabeth!

I was wondering how extensive your comments will be and if it's ok with you to push back the public notice date one week. The original date is March 21st but the City called yesterday and told Darryl that they only got the draft yesterday.

Thanks!

Kris

Sablad, Elizabeth

From: Poentis, Kris T <kris.poentis@doh.hawaii.gov>
Sent: Friday, February 22, 2013 11:28 AM
To: Sablad, Elizabeth
Subject: RE: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP

Hi Elizabeth,
That's fine. Have a great weekend!
Kris

From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Friday, February 22, 2013 8:35 AM
To: Poentis, Kris T
Subject: RE: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP

Hi Kris,
So, should I send any comments by March 6th?

Have a good weekend!
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Pascua, Noralin F [<mailto:noralin.pascua@doh.hawaii.gov>]
Sent: Thursday, February 21, 2013 10:19 AM
To: Sablad, Elizabeth
Cc: Poentis, Kris T
Subject: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP

Ms. Sablad,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,
Nora
DOH-CWB

Sablad, Elizabeth

From: Sablad, Elizabeth
Sent: Friday, February 22, 2013 10:35 AM
To: 'Poentis, Kris T'
Subject: RE: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP

Hi Kris,
So, should I send any comments by March 6th?

Have a good weekend!
Elizabeth

Elizabeth Sablad
NPDES Permits Office
U.S. EPA Region 9
75 Hawthorne St. (WTR-5)
San Francisco, CA 94105
(415) 972-3044
sablad.elizabeth@epa.gov

From: Pascua, Noralin F [<mailto:noralin.pascua@doh.hawaii.gov>]
Sent: Thursday, February 21, 2013 10:19 AM
To: Sablad, Elizabeth
Cc: Poentis, Kris T
Subject: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP

Ms. Sablad,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,
Nora
DOH-CWB

Sablad, Elizabeth

From: Pascua, Noralin F <noralin.pascua@doh.hawaii.gov>
Sent: Thursday, February 21, 2013 10:19 AM
To: Sablad, Elizabeth
Cc: Poentis, Kris T
Subject: Draft Permit and Public Notice Date - Permit No. HI 0021296 - Kailua Regional WWTP
Attachments: 0021296-02056PKP.13.PDF; 02056PKP.13a.doc; 02056PKP.13b.doc

Ms. Sablad,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,
Nora
DOH-CWB